



Anti-bribery policy

The VGC Group and its associated companies operate an ethical and open approach to the way we do business. We do not tolerate any form of unethical or inappropriate behaviour including acts of corruption, bribery or unfair anti-competitive business practices.

This policy applies to all employees and associated persons including officers of the company, temporary workers, consultants, contractors, agents and subsidiaries acting for, or on behalf of, the company.

While working on behalf of the VGC Group all employees and associated persons shall maintain the highest standards of business conduct and pursue our business interests with the highest degree of integrity.

A bribe is defined in the Bribery Act 2010 as "a financial or other advantage" offered, promised or given to induce a person to perform a relevant function or activity improperly, or to reward them for doing so. This could include but is not limited to a gift, reward, entertainment or incentive.

The following will be adhered to when working for/or on behalf of VGC Group:

- You shall not accept, directly or indirectly, any gift, inducement or incentive during the course of your duties.
- If you are offered any incentive in the course of your duties you must inform the group services director who will review the offer and decide whether it is appropriate. All items offered will be recorded on a register which will be reviewed on a regular basis. All offers are deemed to belong to the company. The company will decide whether you are permitted to avail yourself of any opportunity
- You shall not offer whether directly or indirectly any bribe or incentive during the course of your duties.
- You should notify the group services director should you become aware of any colleague or third party who has offered or received a bribe or incentive. This can be done in the strictest of confidence.
- You should obtain prior approval from your line manager of all gifts or entertainment provided to others. You will need to provide the receipts thereof to the Accounts department. All gifts or entertainment provided by the company will be approved by a director and recorded on the company gift register.
- VGC departmental managers must ensure that appropriate information and training is provided to their teams and only the approved supply chain is engaged, who have been through the supplier approval process. Failure to comply with this policy is a serious matter.

A criminal offence will be committed under the Bribery Act 2010 if an employee or associated person offers, promises, gives, requests, receives or agrees to receive bribes or offers, promises or gives a bribe to a public official with the intention of influencing that official in the performance of his/her duties.

Where there are allegations of inappropriate actions the circumstances will be fully investigated. If it is deemed that inappropriate actions have taken place it will be dealt with in accordance with our disciplinary processes for employees and / or dismissal or termination of contract. Where appropriate this will also be reported to the police or other statutory body.

Signed:

A handwritten signature in black ink that reads 'L.R. McKidd'.

Laurence McKidd
Managing director

Dated: June 2019